BNL Environmental Management System Operational Controls Form

OPERATIONAL CONTROL FOR SIGNIFICANT ENVIRONMENTAL ASPECTS:

COMPLETED BY: M. GAFFNEY

DATE: OCTOBER 1, 2002 REV: C

1. Operation(s): Staff Shop Operations (AM-524-SSO)

2. Activity(ies):

- 1) Atmospheric discharge from machined parts and welding (permitted emission points)
- 2) Waste generation (hazardous and regulated industrial)
- 3) Chemical storage (flammable)

3. Operational Controls (technological, operational, procedural operating criteria):

- 1) Haz Waste 90 Day Area/Weekly Inspection Program
- 2) Haz Waste Satellite Accumulation Areas
- 3) Chemical Management System (CMS)
- 4) Chemicals Stored in Flammable Storage Cabinets
- 5) Laboratory's Title V Facility Air Emission Permit (NYSDEC 1-4722-0032/00155).
- 6) Log books for permitted air emission points/material use records
- 7) Catch basins below nozzles where distribution occurs from bulk drums to smaller containers
- 8) SMD OPM 2.12, "Work Control and Planning"
- 9) Tier I program and self-assessments

4. Maintenance Plan(s):

Air hoods maintained by MMC on a "as needed basis." Cyclone units maintained by Central Shops on a "as needed basis." No processes are performed when hood is OOC. Facility Support verifies airflow through hood on an annual basis.

5. Actions to be Taken if Controls Fail:

- 1) Call spill response hotline X2222
- 2) Local Emergency Plan
- 3) 90 Day Area contingency Plan

6. Records:

- Log books for permitted air hoods/material use records
- Tier I Inspection records /Tracking Database

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- 90 Day Area Inspections
- Operational Control Form
- Process Assessment Form/Corrective Action Tracking Database
- 7. Responsibilities: [(a) to ensure controls are in place; (b) to ensure controls keep working; (c) to take action when controls fail; (d) to create and keep records relative to operational controls]

| Name | Responsibility | |
|-------------------------------------|---|--|
| Staff Shop Supervisor | Maintain air emission log book/material usage information Maintain Satellite Accumulation areas Spill Control | |
| Building Manager | Ensure air hoods are operational | |
| Central Shop | Cyclone Unit MaintenanceCutting Oil Recycling | |
| SMD Tier I Inspection Committee | Tier I documentation | |
| 90 Day Area Manager/ESH Coordinator | Maintain 90 Day Area per Hazardous Waste Subject Area | |
| ESH Coordinator | Update Process Assessment Forms | |
| ECR | Update PAF Corrective Action Tracking Database | |

8. Training:

| Name | Training | Date |
|--|---------------------------------------|--------------------------|
| 90 Day Area Manager/ESH Coordinator | RCRA 90 Day - Area Manager (HP-90Day) | See <u>BTMS Database</u> |
| Technician Supervisor | Haz. Waste Generator (HP-RCRIGEN3) | |
| Technician | AM-ENV-FS3 | |